

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

**KENNETH TAYLOR,
TDCJ-CID No. 00828757,**

v.

**BRYAN COLLIER, *et al.*,
Defendants.**

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CIVIL ACTION No. 3:17-CV-00358

JURY

Defendants Collier, Jones, and Miller's Answer and Jury Demand

Defendants Bryan Collier, Jacqueline Jones, and Eric Miller file their answer, denying the Plaintiff's allegations. Pursuant to Rule 8(b), Federal Rules of Civil Procedure, Defendants Collier, Jones, and Miller deny each and every allegation contained in Plaintiff's Complaint. Defendants assert their entitlement to qualified, official, sovereign, and Eleventh Amendment immunity as they apply. Defendants also assert the affirmative defenses of statute of limitations and res judicata/collateral estoppel.

Defendants ask the Court to deny Plaintiff any and all relief demanded in his complaint and that they recover their costs including reasonable attorney's fees and such other relief as to which the Court deems they are entitled.

Defendants assert that if the Plaintiff has accrued three-strikes under The Prison Litigation Reform Act (PLRA) 28 U.S.C. § 1915(g), and his suit does not fall within the exception of the provision, he is not entitled to proceed *in forma pauperis* in this case.

Defendants state the failure to fully and timely exhaust administrative remedies is a bar to a plaintiff filing suit in the federal court pursuant to 42 U.S.C. section 1997e(e).

Defendants demand a trial by jury.

Respectfully submitted,

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/s/ Briana M. Webb

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ATTORNEYS FOR DEFENDANTS

NOTICE OF ELECTRONIC FILING

I, **BRIANA M. WEBB**, Assistant Attorney General of Texas, do hereby certify that I have electronically submitted for filing a true copy of the above **Defendants Collier, Jones, and Miller's Answer and Jury Demand** in accordance with the Electronic Case Files System of the Southern District of Texas on January 31, 2018.

/s/ Briana M. Webb

BRIANA M. WEBB

Assistant Attorney General

CERTIFICATE OF SERVICE

I, **BRIANA M. WEBB**, Assistant Attorney General of Texas, certify that a true copy of the above **Defendants Collier, Jones, and Miller's Answer and Jury Demand** has been served by placing it in United States Mail, postage prepaid, on January 31, 2018, addressed to:

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